

EXHIBIT 1

CZ

Jesenia Martinez <jmartinez@cz.law>

RE: Further request from Judge You RE: 3:21-cv-00965-YY Hollis v. RandR Restaurants, Inc et al

1 message

Kuchulis, Anthony <AKuchulis@littler.com>

Tue, Sep 6, 2022 at 5:26 PM

To: "Farley, Noreen" <NFarley@littler.com>, Trish Hunt <Trish_Hunt@ord.uscourts.gov>

Cc: "amanda@maclaw.law" <amanda@maclaw.law>, "jmartinez@cz.law" <jmartinez@cz.law>, "Ridgeway, Joseph Q." <JRidgeway@littler.com>, "Munoz, Colleen" <CMunoz@littler.com>

Dear Ms. Hunt,

Please forgive any confusion – Defendants intended to withdraw the motion for leave to amend entirely and no longer intend to pursue the counter-claims proposed in federal court. So no need for Judge You to review or for further briefing by either party or a hearing on it.

I believe you advised us to file a “motion to strike” to withdraw the motion formally. We will get that filed this week. Thank you.

Anthony Kuchulis

Attorney at Law

503.889.8910 direct, 503.310.9904 mobile, 503.961.1335 fax

AKuchulis@littler.com

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From: Farley, Noreen <NFarley@littler.com>

Sent: Tuesday, September 6, 2022 5:02 PM

To: Trish Hunt <Trish_Hunt@ord.uscourts.gov>

Cc: Kuchulis, Anthony <AKuchulis@littler.com>; amanda@maclaw.law; jmartinez@cz.law; Ridgeway, Joseph Q. <JRidgeway@littler.com>; Munoz, Colleen <CMunoz@littler.com>

Subject: RE: Further request from Judge You RE: 3:21-cv-00965-YY Hollis v. RandR Restaurants, Inc et al

Hello Trish,

Attached please find a redline of Defendants' filed Answer (ECF No. 20) vs. Defendants' Proposed First Amended Answer and Counterclaims (ECF No. 56-1). Please let me know if you have any questions.

Defendants have also decided to withdraw their request for an expedited hearing for their [56] Motion for Leave to File First Amended Complaint and Counterclaims, and will stick to the normal briefing response times as provided in LR 7-1(e).

Thank you,

Noreen

Noreen Farley
Attorney at Law
971.201.9690 mobile
NFarley@littler.com

Pronouns: She/Her



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From: Trish Hunt <Trish_Hunt@ord.uscourts.gov>
Sent: Friday, September 2, 2022 7:45 AM
To: Kuchulis, Anthony <AKuchulis@littler.com>; amanda@maclaw.law; jmartinez@cz.law; Ridgeway, Joseph Q. <JRidgeway@littler.com>
Cc: Farley, Noreen <NFarley@littler.com>
Subject: Further request from Judge You RE: 3:21-cv-00965-YY Hollis v. RandR Restaurants, Inc et al

Good morning Counsel,

Judge You would also request that you attach a red-lined copy of the proposed amended complaint.

Thank you,

Trish Hunt
Courtroom Deputy to Hon. Youlee Yim You
United States District Court for the District of Oregon
trish_hunt@ord.uscourts.gov
503-326-8057

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From: Trish Hunt
Sent: Thursday, September 1, 2022 4:02 PM
To: akuchulis@littler.com; amanda@maclaw.law; jmartinez@cz.law; jridgeway@littler.com
Subject: 3:21-cv-00965-YY Hollis v. RandR Restaurants, Inc et al

Good afternoon,

Counsel called earlier asking if a hearing will be set on the motion and/or if there would be an expedited briefing schedule. Judge You has advised me that if an expedited briefing schedule is requested, please confer and propose one to the court.

Thank you,

Trish Hunt

Courtroom Deputy to Hon. Youlee Yim You

United States District Court for the District of Oregon

trish_hunt@ord.uscourts.gov

503-326-8057

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